




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 12 1996

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations on the Petroleum Products Corporation Site.

FROM: Bruce Means, Chair 
National Remedy Review Board

TO: Richard D. Green, Acting Director
Waste Management Division
EPA Region 4

Purpose.

The purpose of this memorandum is to document the findings of the National Remedy Review Board (NRRB) on the proposed "interim" remedial action for the Petroleum Products Corporation Site in Florida.

Background.

As you recall, the Administrator established the NRRB as one of the October 1995 Superfund Administrative Reforms to help control remedy costs and promote consistent and cost-effective decisions. The Board will review all proposed cleanup actions where: (1) the estimated cost of the preferred alternative exceeds \$30 million, or (2) the preferred alternative costs more than \$10 million and is 50% more expensive than the least-costly, protective, ARAR-compliant alternative. In its review, the NRRB considers the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates for alternatives; regional, State/tribal, and other stakeholder opinions on the proposed actions (to the extent they are known at the time of review); and any other relevant factors or program guidance.

Generally, the NRRB makes "advisory recommendations" to the appropriate Regional decision maker before the Region issues the proposed plan. These recommendations are then to be included in the Administrative Record for the site.

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While the Region is expected to give the Board's recommendations substantial weight, other important factors, such as subsequent public comment or technical analyses of remedial options, may influence the final Regional decision. It is important to remember that the NRRB does not change the Agency's delegation authorities or alter in any way the public's current role in site decisions. This Reform is intended to focus the program's extensive experience on decisions at a select number of high stakes sites.

Findings

The NRRB reviewed the Petroleum Products briefing package as well as information submitted by the potentially responsible party. The Board met on May 8, 1996, with the EPA and State Remedial Project Managers for the site. Based on their review and discussion, the members of the NRRB make the following observations.

Overall, the NRRB supports the proposed remedy (Alternative 7) for the Interim Action, which will employ soil stabilization/ solidification in the source area at an estimated cost of \$12,871,000. However, the NRRB's support for this alternative is based on the Region's high confidence that fixation will be able to capture most (e.g., 75 to 95 percent) of the contaminants of concern. Given less confidence, or less complete capture, the NRRB questions whether the remedy goals would be best achieved by this treatment-oriented option. The Region should consider containment-based options should fixation not capture a high proportion of the contaminants. The Board would like to note, however, that Alternative 7 is not inconsistent with future action anticipated at the site in any event.

The Board also makes the following observation: Alternative 7 triggered Board review because it costs more than \$10 million and was 50 percent more expensive than Alternative 2 (presented as the least-costly, protective, ARAR-compliant alternative in the NRRB briefing package). However, both the Region and the State report that they do not believe Alternative 2 to be protective. Based on the information presented, the Board supports this conclusion. Thus, in retrospect, there appears to be no alternative in the proposed plan that would fully satisfy the above criterion and trigger the Board's review. Future NRRB site nominations should reflect the Region's best judgement in the areas of estimated relative costs, protectiveness and ARAR compliance.

Recommendations.

Given greater uncertainty in the overall effectiveness of the proposed Alternative 7 to capture soil contaminants, the Region may want to consider an additional alternative with the following characteristics:

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- Instead of solidifying the entire area(s) encompassing high level polycyclic aromatic hydrocarbon and lead contamination, the Region should consider solidification and stabilization (s/s) of the outer boundaries of the hot spot(s), and combine this with a groundwater pump and treat system to remove the oil and prevent contaminant releases beyond the s/s periphery. The s/s soils would be equivalent to a grout curtain. When combined with a constant inward hydraulic gradient, s/s may provide an opportunity to restore the aquifer and eliminate the need for a groundwater technical impracticability waiver.
- If Alternative 7 is selected, the Region should place sufficient cover material over the stabilized hot spot(s) to address hazards to human health from direct contact exposure to the stabilized soils.
- The Region should clarify whether a potential health threat exists based on direct contact exposures associated with industrial land use. Given high surface soil lead levels, it is unclear why direct contact risks for workers are considered negligible. The Board recommends that the Region include a clear, detailed discussion of the nature of the threat posed by surface soil contamination and related risk management decisions in the final ROD. However, the Board cautions that the Region should consider the need for final disposition of site soils when designing the interim remedy. Should a surface soil threat exist, s/s alone may not fully address it. Further, it may be inappropriate to utilize s/s on surface soils as part of an interim response action, only to follow this with surface soil excavation in the final ROD.

The NRRB appreciates the Region's efforts to work closely with the State, community, and responsible party to identify the current proposed remedy. The Board members also express their appreciation to both the Region and the State of Florida for their participation in the review process. We encourage Region 4 management and staff to work with their Regional NRRB representative and the Headquarters Region 4/10 Regional Accelerated Response Center to discuss appropriate follow-up actions.

Please do not hesitate to give me a call at 703-603-8815 if you have any questions.

cc: S. Luftig
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